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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **OAKLAND DIVISION**

11 Abdi Nazemian, et al.,

12 Plaintiffs,

13 vs.

14 NVIDIA Corporation,

15 Defendant.  
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Master File Case No. 4:24-cv-01454-JST (SK)

**FURTHER JOINT STIPULATION AND  
ORDER RE DEPOSITION PROTOCOL  
SUBMISSION DEADLINE**

Case No. 4:24-cv-01454-JST (SK)

Pursuant to Civil Local Rule 7-12, the undersigned Parties to the above-captioned action, by and through their respective counsel of record, hereby stipulate the following:

1. WHEREAS, on March 21, 2025, the Parties filed a joint stipulation to extend the Parties' deadline to submit an agreed upon Deposition Protocol or a joint letter brief regarding any disputed areas, from March 25, 2025 to April 24, 2025, which was granted on March 25, 2025 (*Nazemian*, ECF Nos. 128, 130; *Dubus*, ECF Nos. 82, 84);

2. WHEREAS on April 22, 2025, the Parties filed a joint stipulation to extend the Parties' deadline to submit an agreed upon Deposition Protocol or a joint letter brief regarding any disputed areas, from April 24, 2025 to May 15, 2025, which was granted on April 22, 2025 (*Nazemian*, ECF Nos. 131, 132; *Dubus*, ECF Nos. 85, 86);

3. WHEREAS on May 13, the Court granted the parties stipulation regarding case consolidation and consolidated the *Nazemian* and *Dubus* cases in *Nazemian v. NVIDIA Corp.*, Case No. 4:24-cv-01454-JST (SK) (*Nazemian*, ECF No. 144; *Dubus*, ECF No. 89);

4. WHEREAS on May 15, 2025, the Parties filed a joint stipulation to extend the Parties' deadline to submit an agreed upon Deposition Protocol or a joint letter brief regarding any disputed areas, from May 15, 2025 to May 28, 2025 and for the parties to submit any jointly-proposed revisions to the schedule by May 28, 2025, which was granted on May 19, 2025 (*Nazemian*, ECF Nos. 145, 147);

5. WHEREAS, since that extension the parties have exchanged several drafts and the parties have continued to make progress toward an agreed deposition protocol and proposed modifications to the Court's scheduling order (ECF No. 71), but have one unresolved issue on which they have not yet reached impasse and are hopeful can be resolved with additional time to negotiate, and certain issues may require modifications to the Court's scheduling order (ECF No. 71);

6. WHEREAS, the parties believe that a further extension of the Deposition Protocol deadline is needed so they can avoid burdening the Court with a dispute that may be resolved with additional time;

NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED by and between the Parties and their respective counsel, subject to the Court's approval, that the Parties' deadline to submit an agreed upon Deposition Protocol or a joint letter brief regarding any disputed areas, shall be further

extended from May 28, 2025 to June 2, 2025, and the parties will submit any jointly-proposed revisions to the schedule by June 2, 2025.

Dated: May 28, 2025

Respectfully Submitted,

By: /s/ Elisha Barron

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Dated: May 28, 2025

Respectfully Submitted,

By: /s/ Rachael L. McCracken

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*Attorneys for Defendant NVIDIA Corporation*

**ORDER**

Pursuant to the stipulation of the Parties, it is hereby ORDERED that the Parties' deadline for filing an agreed upon Deposition Protocol, or filing a joint letter brief with the Parties' respective proposals, shall be continued to June 2, 2025.

**IT IS SO ORDERED.**

Dated: \_\_May 29, 2025\_\_



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The Honorable Sallie Kim  
U.S. Magistrate Judge

**ATTESTATION PURSUANT TO CIVIL L.R. 5-1**

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: May 28, 2025

/s/ Elisha Barron  
Elisha Barron